



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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EC-2
980362

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Ref: EPR-EP

Mr. Robert L. Storch
Forest Supervisor
Grand Mesa, Uncompahgre & Gunnison National Forests
2250 Highway 50
Delta, CO 81416

Re: EPA Comments on Uncompahgre
National Forest Travel Plan DEIS

Dear Mr. Storch:

The U.S. Environmental Protection Agency (EPA) Region VIII has reviewed the draft environmental impact statement (DEIS) on the Uncompahgre National Forest Travel Plan. Our review of the DEIS was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

EPA fully supports the planned transition from "open travel" to "restricted travel." Open travel allows off-route travel and defacto authorization of user-created trails without regard to environmental sensitivity of an area or location on over 670,000 acres of the Forest. Open travel therefore does not allow the Forest to ensure that Uncompahgre Forest Plan goals are met including: managing vegetation, improving wildlife habitat diversity, maintaining water quality to standards, conserving soil resources, maintaining long-term land productivity, and providing a safe, efficient and environmentally sound transportation system. These Forest Plan Goals were set through an open NEPA process involving a great deal of public input. This travel plan should go as far as possible to meet the goals and standards set forth in the Forest Plan. The current degree of impact from off-highway vehicles (OHVs) could not have been foreseen when the Forest Plan was written. The hundreds of miles of unplanned and unauthorized, user-created trails that have cropped up since the Forest Plan are evidence that some measure of control is necessary to protect the natural resources of the Uncompahgre National Forest. Moving to restricted travel is the best and only way to protect wetlands and riparian areas, areas with fragile soils, and areas required by wildlife as undisturbed habitat.

The travel restrictions proposed in this plan appear appropriately targeted to improve the quality of the environment by reducing the number of stream crossings, and by reducing travel in water corridors and wildlife sanctuary areas. This plan, if fully implemented with mitigation and enforcement, will improve the quality of Uncompahgre National Forest environment. The travel



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restrictions in this plan are also consistent with the goals set out in the 1998 San Miguel Watershed Plan for establishing a sustainable and ecologically based recreation management effort.

In fact, many of the objectives of this Travel Plan are shared by the San Miguel Watershed Plan, in which both the Forest Service and EPA have agreed to participate. In order to meet the objectives in the Watershed Plan, we encourage the Forest Service to continue to take full advantage of the collaborative process laid out in the Watershed Plan as you continue through this travel planning process. The San Miguel Watershed Coalition is a broad-based group of informed Forest users that will help to make this plan effective and viable.

This DEIS states (p. 1-3) that "the Forest Plan will be amended to include any decisions based on this analysis which differ from current Forest Plan direction." Because that Forest Plan is, in effect, an agreement between the public and the Forest Service on the management of the land, we feel it is critical that inconsistencies with the Forest Plan that would require a Forest Plan amendment be specifically disclosed for each alternative in the EIS prior to the decision. Because the extent of deviation from the Forest Plan is not clearly disclosed, it is not possible to foresee whether amendments to the Forest Plan resulting from this action might be considered significant, or whether alternatives might be available to reduce the need for amendments.

Alternative 5 is identified by EPA as the "environmentally preferred alternative." Alternative 5 would be the most favorable to the soils resource (p. 3-6), has the least number of stream crossings (Table W-2), has the least acres of vegetation impact (Table 2-3), has among the least miles of route in the water influence zone (Table W-1), has the greatest miles of decommissioned route (Table S-1), and comes closest to meeting the Forest Standard for habitat effectiveness. Alternative 5 meets the project purpose and need, provides a broad range of recreation opportunities, is least impactful to the environment, and has the lowest implementation costs (Table 2-3). Alternative 5 appears also to be the alternative most consistent with the themes and goals of the San Miguel Watershed Plan centered on sustainable recreation and ecosystem-based watershed management. Given these facts, and given that Alternative 5 appears to require the least Forest Plan amendments, it is unclear why the Forest Service selected Alternative 3 as the agency's "preferred alternative." We found in the document no explanation of the reason Alternative 3 was selected as the preferred alternative.

Because there are alternatives which meet the purpose and need, but have less environmental impact than the preferred alternative, EPA is rating the Draft Uncompahgre Travel Plan EIS as EC - 2 (Environmental Concerns, Insufficient Information). The document contains insufficient information regarding Forest Plan compliance, impacts to wetlands and waters of the United States, and on several issues outlined in our enclosed specific comments. "EC" indicates that the EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts. The identified additional information, data, analyses or discussion should be included in the final EIS. A full description of EPA's EIS rating system is enclosed.

We appreciate the opportunity to review this project and provide comments. Thank you for your willingness to consider our comments at this stage of the process, and we hope they will be useful to you. Should you have any questions regarding these comments, you may contact Phil Strobel of my staff at (303) 312-6704.

Sincerely,



Cynthia G. Cody
NEPA Unit Chief
Ecosystems Protection Program

Enclosures

cc: Elaine Suriano, EPA Office of Federal Activities
David Schneck, San Miguel County Environmental Health Department
Dan Beley, Colorado Department of Public Health and Environment
Linda Luther, San Miguel Watershed Coordinator
Tim Lippert, Norwood Public Works

EPA's Specific Comments on the Uncompahgre National Forest Travel Plan DEIS

Soils

- The DEIS addresses potential irreversible effects to shallow-to-sandstone-bedrock soils (p. 3-7). No information is provided on where these soils occur on the Forest or whether any of the existing system or non-system routes are affecting these highly sensitive soils.
- The "Soils 4" mitigation measure (p. 3-8) states that for all alternatives, travel ways that occur in critical soils will be relocated, decommissioned, or reinforced (through extra cross drains, surfacing and re-vegetating). It seems that this mitigation commitment would be difficult to meet given that even in the least impactful alternative there are 1,142 miles of open routes on critical soils (Table 2-3). EPA favors "Soils 4" mitigation, but questions whether this mitigation commitment is realistic given current budget and resources. If the Forest finds itself without the resources to fully meet this mitigation, how would travel ways on critical soils be managed in order to meet the Forest Plan goals of conserving soil resources and protecting water quality?

Travel

- The DEIS identifies at least 437 miles of unplanned, user-created, motorized roads and trails in the Plateau Division (p. 3-28). Is there a similar analysis of unplanned motorized road and trail mileage for the Mountain Division?
- Where this travel plan "formalizes" an unplanned route, will the Forest Service be assessing opportunities to re-route trails or mitigate in areas of sensitive soils, stream crossings, critical habitat, etc.?

Wetlands

- The DEIS does not indicate whether any segments of the user-created, unplanned trail network have direct or indirect impacts to wetlands.

Source-Water Protection Areas

- Beaver Creek and its tributaries in the Lone Cone-Beaver Park area of the Mountain Division have been designated as a "source-water protection area" for the Town of Norwood. Norwood has difficulty meeting drinking water standards for color and turbidity. Any alternative with the potential to increase sediment or other pollutant loading to this watershed must be avoided. Management activities proposed for this area should be closely coordinated with the Town of Norwood and with San Miguel County. Please consider whether there are any additional mitigation measures associated with travel activities in this area that could reduce pollutant loads to Norwood's drinking water.

Wildlife Habitat

- None of the proposed alternatives meet the Uncompahgre Forest Standard for elk habitat capability (Table 2-3). To comply with the Forest Standard, a typical elk management unit must only provide 40% of its habitat capability. Of the action alternatives, Alternative 2 would require a deviation from the forest standard on 50 of the 70 elk management units (*i.e.* 71% of the management units out of compliance), making it the worst of the action alternatives for elk habitat. Alternative 5 is the best of the alternatives with respect to habitat capability with 45 of 70 units (65% non-compliance) requiring deviations from the standard. It appears that open road and trail density is among the most significant factors in meeting the Forest Plan standard for habitat capability. Would it be possible to propose an alternative within this travel plan that would meet the habitat standard in all management units? The reasons for the Travel Plan's lack of compliance with the standard for habitat capability are not clearly stated in the DEIS.

Vegetation

- The "Veg 6" mitigation measure (p. 3-131) would not allow off-route travel during wet conditions in order to protect the soils resource (an Uncompahgre Forest Plan Goal). It is unclear why this mitigation measure would apply to Alternatives 2, 4 and 5, but not apply to Alternative 3, the preferred alternative. Please consider adding Veg 6 to Alternative 3.

Dispersed Recreation Management

- The document did not appear to analyze whether persons-at-one-time per acre (PAOT) capacities are met in the existing condition and with each alternative as directed by Dispersed Recreation Management Directive "03" in the Forest Plan. The final EIS should disclose the PAOT capacities and the mechanisms within each alternative that would ensure that PAOT capacities are not exceeded.

Winter Use and Snowmobiles

- A study of the effects of snowmobiling indicates that many plants are susceptible to damage or destruction by snowmobiles. The impacts vary with severity of climate, snow depth, intensity of use, and the susceptibility of individual species to physical injury or freezing. Young conifers are especially vulnerable unless protected by deep snow. The study showed that in areas used by snowmobiles that are being reforested, shrubs generally increase at the expense of trees. Soil temperatures beneath undisturbed snow often remain above freezing during the winter and plants usually are not injured, but temperatures under snow compacted by snowmobiles are substantially lower as the snow loses much of its insulating capacity. Perennial plants with large, fleshy roots are most susceptible to freezing.. (Source: W.J. Wanek, A Continuing Study of the Ecological Impact of Snowmobiling in Northern Minnesota. Final Research Report for 1973-1974. Center for Environmental Studies, Bemidji State College, Bemidji, MN, 1974) Please consider this study as you decide on winter travel routes for the Forest, avoiding areas with sensitive plant species and areas in early stages of forest regeneration.

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action*

Environmental Impact of the Action

LO -- Lack of Objections

The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC -- Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO -- Environmental Objections

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU -- Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 -- Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 -- Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 -- Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.